

1 BRAMSON, PLUTZIK, MAHLER & BIRKHAEUSER, LLP
2 Alan R. Plutzik (Bar No. 077785)
3 L. Timothy Fisher (Bar No. 191626)
4 Kathryn A. Schofield (Bar No. 202939)
5 2125 Oak Grove Road, Suite 120
6 Walnut Creek, California 94598
7 Telephone: (925) 945-0200
8 Facsimile: (925) 945-8792

9 SCHIFFRIN & BARROWAY LLP
10 Eric L. Zagar
11 Sandra G. Smith
12 280 King of Prussia Road
13 Radnor, PA 19087
14 Telephone: (610) 667-7706
15 Facsimile: (610) 667-7056

16 Attorneys for Plaintiffs
17 Brozovich and Younan

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 FRANK BROZOVICH, Derivatively on Behalf
15 of Nominal Defendant ACTEL
16 CORPORATION,

17 Plaintiff,

18 v.

19 JOHN C. EAST, ESMAT Z. HAMDY, PAUL
20 V. INDACO, FARES N. MUBARAK, DENNIS
21 G. KISH, HANK L. PERRET, DOUGLAS D.
22 GOODYEAR, JEFFREY M. SCHLAGETER,
23 DAVID M. SUGISHITA, DENNIS F. NYE,
24 CARL N. BURROW, ROBERT J. SMITH II,
25 ROBERT G. SPENCER and JACOB
26 JACOBSSON,

27 Defendants,

28 and
ACTEL CORPORATION,

Nominal Defendant.

Case No. C06-05352 JW (HRL)

**CORRECTED STIPULATION AND
[PROPOSED] ORDER VACATING
SCHEDULE FOR FILING OF
AMENDED COMPLAINT**

STIPULATION

WHEREAS, *Brozovich v. East, et al.* (06-cv-05352-JW) was filed on August 30, 2006;

WHEREAS, on November 1, 2006 in the *Brozovich* action, this Court ordered that an amended complaint be filed, and pursuant to that order the amended complaint is currently calendared for January 2, 2007;

WHEREAS *Younan v. East, et al.* (06-cv-06832-JW) was filed on November 2, 2006;

WHEREAS, on November 14, 2006 the parties filed a Stipulation and [Proposed] Order Consolidating Cases for All Purposes, and Setting Schedule for Filing of Consolidated Complaint;

WHEREAS, on November 15, 2006, Plaintiffs Brozovich and Younan filed a Motion to Appoint Lead Plaintiffs, Lead Counsel and Liaison Counsel ("Lead Plaintiff Motion"), to be heard on January 8, 2007 at 9:00 a.m., after the amended complaint in the *Brozovich* action is currently calendared;

WHEREAS, no opposition to the Lead Plaintiff Motion was filed;

WHEREAS, if the Court orders the *Brozovich* and *Younan* actions to be consolidated, Plaintiffs will be filing a consolidated amended complaint following the hearing;

WHEREAS, the parties have entered into a Stipulation that Defendants need not respond to either the *Brozovich* or *Younan* complaints until such time as Plaintiffs file a consolidated complaint,

WHEREAS, counsel for Plaintiff and Defendants have met and conferred and have agreed that it is not in the interest of judicial efficiency for Plaintiffs to file to an amended complaint in the *Brozovich* action and a consolidated amended complaint in the consolidated action;

THEREFORE, IT IS STIPULATED AND AGREED by Plaintiffs and Defendants, through their respective counsel of record that the deadline for filing the amended complaint in the *Brozovich* action should be vacated pending an order on Plaintiffs' Lead Plaintiff Motion and the Consolidation Stipulation.

IT IS SO STIPULATED.

1
2 DATED: December 26, 2006

BRAMSON, PLUTZIK, MAHLER &
BIRKHAUSER, LLP

3
4 By: 

Alan R. Plutzik (Bar No. 077785)
L. Timothy Fisher (Bar No. 191626)
Kathryn A. Schofield (Bar No. 202939)
2125 Oak Grove Road, Suite 120
Walnut Creek, CA 94598
Telephone: (925) 945-0200
Facsimile: (925) 945-8792

9 SCHIFFRIN & BARROWAY, LLP

Eric Zagar
Sandra G. Smith
280 King of Prussia Road
Radnor, PA 19087
Telephone: 610-667-7706

Counsel for Plaintiffs Brozovich and Younan

10
11
12
13
14
15 DATED: December 26, 2006

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

16
17 By: /s/ Bahram Seyedin-Noor

Bahram Seyedin-Noor

18
19 Nina F. Locker (Bar No. 123838)
Caz Hashemi (Bar No. 210239)
Bahram Seyedin-Noor (Bar No. 203244)
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 493-6811

Counsel for Defendants

1 I, Alan R. Plutzik, am the ECF User whose identification and password are being used to
2 file the Stipulation regarding related cases in compliance with General Order 45.X.B,
3 hereby attest that Bahram Seyedin-Noor has concurred in this filing.

4 Dated: December 26, 2006

BRAMSON, PLUTZIK, MAHLER &
BIRKHAEUSER, LLP

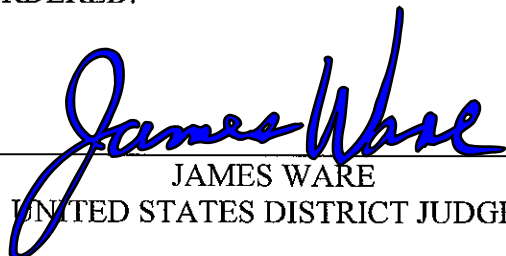
6 By: /s/ Alan R. Plutzik
7 Attorney for Plaintiffs

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: December 27, 2006



JAMES WARE
UNITED STATES DISTRICT JUDGE